

**Louisiana Department of Environmental Quality  
Office of Environmental Services**

**STATEMENT OF BASIS  
For  
Activity Number: PER20070001  
Permit No. 3140-00011-V3**

**Epps Compressor Station  
Agency Interest No. 9512  
Trunkline Gas Company, LLC  
Epps, West Carroll Parish, Louisiana**

**I. APPLICANT**

**Company**

Trunkline Gas Company, LLC  
8100 Big Lake Road  
Lake Charles, Louisiana 70605

**Facility**

Epps Compressor Station  
745 Highway 134, Epps, West Carroll Parish, Louisiana 71237-9067  
UTM Coordinates: 633.70 kilometers East and 3609.80 kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

Trunkline Gas Company utilizes eight reciprocal engines and two turbines to compress natural gas to pipeline pressure for transmission. Other emissions sources include generator engines, tanks, loading, and fugitives. The station currently operates under Permit 3140-00011-V2, dated January 18, 2006.

**III. PROPOSED PERMIT / PROJECT INFORMATION**

**Proposed Permit**

A Part 70 operating permit application and Emission Inventory Questionnaire dated February 6, 2007 were submitted requesting a Part 70 operating permit modification.

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, and in the local newspaper. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List. The application and proposed permit were submitted to the West Carroll Parish Library. The proposed permit was submitted to US EPA Region 6. All comments will be considered prior to the final permit decision.

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**Project description**

Trunkline Gas Company requested a permit modification to reduce operating hours of two compressors and three generator engines. Emissions from the station were recalculated based on updated emissions factors and current operating conditions.

**Permitted Air Emissions**

Permitted emissions from the station in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM <sub>10</sub>	17.34	16.63	- 0.71
SO <sub>2</sub>	2.60	2.55	- 0.05
NO <sub>x</sub>	2306.46	2881.54	+ 575.08
CO	401.96	224.00	- 177.96
VOC, total	93.56	76.94	- 16.62

**Prevention of Significant Deterioration (PSD) Applicability**

Emission increases are due to the recalculation. There is no physical modification/ construction at the facility at this time. Therefore, PSD analysis was not required.

**Maximum Achievable Control Technology (MACT) requirements**

Emissions of Toxic Air Pollutants (TAPs) from the terminal are less than the major source threshold. MACT is not required.

**Air Modeling Analysis**

Emissions from these units are not expected to cause or to contribute to any National Ambient Air Quality Standards (NAAQS) or Ambient Air Standards (AAS) exceedances.

Dispersion Model Used: None

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

**Insignificant Activities (LAC 33:III.501.B.5)**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the proposed Part 70 permit. The

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applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

#### IV. PERMIT SHIELDS

The Permit does not include any Permit Shields

#### V. PERIODIC MONITORING

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit. Federally enforceable conditions are used to limit the operating time of the compressor engines. Permittee will monitor monthly operating time and twelve consecutive month total operating time. The total compressor engine operating time is reported annually.

#### VI. APPLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS

ID No:	Requirement	Status	Citation	Explanation
EQT004 - EQT011	LAC 33:III.1503.C. Standards for SO <sub>2</sub>	Exempt	LAC 33:III.1503.C	SO <sub>2</sub> emissions < 250 tons/year
	LAC 33:III.1511 CEM for SO <sub>2</sub>	Exempt	LAC 33:III.1511.A	SO <sub>2</sub> emissions < 100 tons/year
	40 CFR 63 Subpart ZZZZ	Does not apply	40 CFR 63.6590(b)(3)	Existing lean burn engines or limited use engines (<100 hrs/year)
EQT017, EQT033	LAC 33:III.2103 for VOC tanks	Does not apply	LAC 33:III.2103.A	Vapor Pressure < 1.5 psia
	40 CFR 63 Subpart Kb	Does not apply	40 CFR 60.110b(a)	Vapor Pressure < 0.51 psia
EQT019, EQT023, EQT026, EQT027	LAC 33:III.2103 for VOC tanks	Exempt	LAC 33:III.2103.G.1	Prior to custody transfer Located in West Carroll
	40 CFR 63 Subpart Kb	Does not apply	40 CFR 60.110b(b)	Tank Volume < 20,000 gallons
EQT021	40 CFR 63 Subpart Kb	Does not apply	40 CFR 60.110b(b)	Tank Volume < 20,000 gallons
EQT028, EQT029	LAC 33:III.1503.C. Standards for SO <sub>2</sub>	Exempt	LAC 33:III.1503.C	SO <sub>2</sub> emissions < 250 tons/year
	LAC 33:III.1511 CEM for SO <sub>2</sub>	Exempt	LAC 33:III.1511.A	SO <sub>2</sub> emissions < 100 tons/year
	NSPS Subpart GG for turbines	Does not apply	40 CFR 60.330(b)	No modification after October 3, 1977

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ID No:	Requirement	Status	Citation	Explanation
EQT030, EQT031, EQT032	LAC 33:III.1503.C. Standards for SO <sub>2</sub>	Exempt	LAC 33:III.1503.C	SO <sub>2</sub> emissions < 250 tons/year
	LAC 33:III.1511 CEM for SO <sub>2</sub>	Exempt	LAC 33:III.1511.A	SO <sub>2</sub> emissions < 100 tons/year
GRP002	40 CFR 63 Subpart ZZZZ	Does not apply	40 CFR 63.6590(a)	Not RICE units (Engines < 500 bhp)
	LAC 33:III.Chapter 51	Exempt	LAC 33:III.5105.B.3	TAP emissions are from combustion devices that burn virgin fossil fuels
	LAC 33:III.Chapter 59 40 CFR 68	Does not apply	LAC 33:III.5901	Facility does not store or process any referenced list substance greater than the threshold amounts.
The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of the permit				

## VII. STREAMLINED REQUIREMENTS

The Permit does not include any streamlined requirements.

## VIII. GLOSSARY

**Best Available Control Technologies (BACT)** - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

**CAM** - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

**Carbon Black** - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

**Carbon Monoxide (CO)** – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.

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**Cooling Tower** – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

**Continuous Emission Monitoring System (CEMS)** – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

**Cyclone** – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

**Duct Burner** – A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

**Federally Enforceable Specific Condition** - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

**Grandfathered Status**- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

**Heat Recovery Steam Generator (HRSG)** – A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

**Hydrogen Sulfide (H<sub>2</sub>S)** - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

**Maximum Achievable Control Technology (MACT)** - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon

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review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines if such reduction is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants – Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO<sub>x</sub>) - Compounds whose molecules consist of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥10 tons per year of any toxic air pollutant; ≥25 tons of total toxic air pollutants; and ≥100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub>- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.